

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

VERONICA KARIUKI

Plaintiff,

v.

ETEAM, INC.

Defendant.

Civil Case No.: 1:15-cv-00934-TSE-JFA

JOSEPH MIGLIOZZI'S EXPERT WITNESS REPORT

1. My name is Joseph Miglioizzi. I am the President of M3 Technology Consultants, an information technology firm located in Centreville, Virginia.

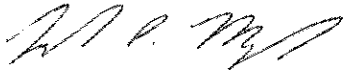
2. I have been hired by Veronica Kariuki as an expert witness in the above-captioned litigation between Veronica Kariuki and eTeam, Inc. to opine whether the e-mail Veronica Kariuki received on August 5, 2013 was sent from the e-mail address knagdev@eteaminc.com and whether the metadata associated with the above mentioned e-mail accurately demonstrates the authenticity of the e-mail. A true and accurate copy of the August 5, 2013 e-mail is attached as Exhibit ~~1~~ **1**. A true and accurate copy of the e-mail with metadata is attached as Exhibit ~~2~~ **2**.

3. I will provide the opinion that the e-mail Veronica Kariuki received on August 5, 2013 and was in fact sent from the e-mail address knagdev@eteaminc.com to the e-mail address veronicamkariuki@gmail.com on August 5, 2013. I will also provide the opinion that the e-mail with the metadata accurately and correctly demonstrates that the August 5, 2013 e-mail was in fact sent on August 5, 2013 from the e-mail address knagdev@eteaminc.com to Veronica Kariuki's e-mail address at veronicamkariuki@gmail.com. The basis for my opinion and/or testimony is my extensive education and experience with information technology, and a review of the August 5, 2013 from knagdev@eteaminc.com and a review of the e-mail with the metadata attached.

4. My qualifications in information technology is: President of M3 Technology Consultants with over 18 years of experience in the field of Information Technology supporting small and midsize professional services companies throughout the Washington DC Metro Area. I have authored the following publications in the previous 10 years: M3TC White Paper on AEC Best Practices.

5. The following is a list of all other cases in which, during the previous four (4) years, I have testified as an expert at trial or by deposition: N/A.

6. My compensation as Veronica Kariuki's expert witness is: \$200/hr.

A handwritten signature in black ink, appearing to read "J.P. Migliozi", written in a cursive style.

Joseph P. Migliozi
President
M3 Technology Consultants, Inc.

November 16th, 2015

From: Kumar Nagdev <knagdev@eteaminc.com>

Date: Mon, Aug 5, 2013 at 12:22 PM

Subject: RE: Resume

To: V Kariuki <veronicamkariuki@gmail.com>

Hi Veronica,

Thanks for the email, But however we are looking for Male Candidate as this is an Field Job.

Thanks & Regards,

Kumar Nagdev

Technical Recruiter

eTeam Inc - "ACCELERATED HIRES"

Efficiency, Synergy, Expertise

732-249-1900 X 525 (T)

908-757-0800 (F)

knagdev@eteaminc.com

www.eteaminc.com

From: V Kariuki [<mailto:veronicamkariuki@gmail.com>]

Sent: Monday, August 05, 2013 12:18 PM

To: Kumar Nagdev

Subject: Resume

Sorry, Resume is attached now.

VKARIUKI

EXHIBIT

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Delivered-To: veronicamkariuki@gmail.com Received: by 10.60.47.33 with SMTP id alcsp102468oen; Mon, 5 Aug 2013 09:24:23 -0700 (PDT) X-Received: by 10.49.25.102 with SMTP id b6mr27178140qeg.91.1375719863350; Mon, 05 Aug 2013 09:24:23 -0700 (PDT) Return-Path: <knagdev@eteaminc.com> Received: from mail.eteaminc.com (mail.eteaminc.com. [75.150.156.122]) by mx.google.com with ESMTP id h19sil0426755qey.46.2013.08.05.09.24.23 for <multiple recipients>; Mon, 05 Aug 2013 09:24:23 -0700 (PDT) Received-SPF: pass (google.com: domain of knagdev@eteaminc.com designates 75.150.156.122 as permitted sender) client-ip=75.150.156.122; Authentication-Results: mx.google.com; spf=pass (google.com: domain of knagdev@eteaminc.com designates 75.150.156.122 as permitted sender) smtp.mail=knagdev@eteaminc.com Received: from MAIL.eteam.eteam ([fe80::508b:e84:1455:343b]) by MAIL.eteam.eteam ([fe80::508b:e84:1455:343b:11]) with mapi id 14.02.0247.003; Mon, 5 Aug 2013 12:22:18 -0400 From: Kumar Nagdev <knagdev@eteaminc.com> To: V Kariuki <veronicamkariuki@gmail.com> Subject: RE: Resume Thread-Topic: Resume Thread-Index: AQHOkfddOR+Wn2FvL0qFcfrjnmNR/ppmGy25w Date: Mon, 5 Aug 2013 16:22:18 +0000 Message-ID: <F50F940FE55A654185CAA4B8C135AB8129CCB728@MAIL.eteam.eteam> References: <CAPj51zFEYrVrOO-v9rkB4-KJTi8xP_EWHJHJOeS-9qAfx_vuPA@mail.gmail.com> In-Reply-To: <CAPj51zFEYrVrOO-v9rkB4-KJTi8xP_EWHJHJOeS-9qAfx_vuPA@mail.gmail.com> Accept-Language: en-US Content-Language: en-US X-MS-Has-Attach: X-MS-TNEF-Correlator: x-originating-ip: [202.131.117.58] Content-Type: multipart/alternative; boundary="000_F50F940FE55A654185CAA4B8C135AB8129CCB728MAILeteam.eteam" MIME-Version: 1.0 --_000_F50F940FE55A654185CAA4B8C135AB8129CCB728MAILeteameteam Content-Type: text/plain; charset="us-ascii" Content-Transfer-Encoding: quoted-printable Hi Veronica, Thanks for the email, But however we are looking for Male Candidate as this is an Field Job. Thanks & Regards, Kumar Nagdev Technical Recruiter eTeam Inc - "ACCELERATED HIRES" Efficiency, Synergy, Expertise 732-248-1900 X 525 (T) 908-757-0800 (F) knagdev@eteaminc.com<mailto:knagdev@eteaminc.com> www.eteaminc.com<http://www.eteaminc.com> From: V Kariuki [mailto:veronicamkariuki@gmail.com] Sent: Monday, August 05, 2013 12:18 PM To: Kumar Nagdev Subject: Resume Sorry. Resume is attached now. VKARIUKI --_000_F50F940FE55A654185CAA4B8C135AB8129CCB728MAILeteameteam Content-Type: text/html; charset="us-ascii" Content-Transfer-Encoding: quoted-printable <html xmlns:v=3D"urn:schemas-microsoft-com:vml" xmlns:o=3D"urn:schemas-microsoft-com:office:office" xmlns:w=3D"urn:schemas-microsoft-com:office:word" xmlns:x=3D"urn:schemas-microsoft-com:office:excel" xmlns:p=3D"urn:schemas-microsoft-com:office:powerpoint" xmlns:a=3D"urn:schemas-microsoft-com:office:access" xmlns:dt=3D"uuid:C2F41010-65B3-11d1-A29F-00AA00C14882" xmlns:s=3D"uuid:BDC6E3F0-6DA3-11d1-A2A3-00AA00C14882" xmlns:rs=3D"urn:schemas-microsoft-com:rowset" xmlns:z=3D"#RowsetSchema" xmlns:b=3D"urn:schemas-microsoft-com:office:publisher" xmlns:ss=3D"urn:schemas-microsoft-com:office:spreadsheet" xmlns:c=3D"urn:schemas-microsoft-com:office:component:sheet" xmlns:odc=3D"urn:schemas-microsoft-com:office:odc" xmlns:oa=3D"urn:schemas-microsoft-com:office:activation" xmlns:html=3D"http://www.w3.org/TR/REC-html40" =

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face {font-family:Tahoma; panose-1:2 11 6 4 3 5 4 4 2 4;} /* Style
Definitions */ p.MsoNormal, li.MsoNormal, div.MsoNormal
{margin:0in; margin-bottom:.0001pt; font-size:12.0pt; font-fan
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margin-right:0in; mso-margin-bottom-alt:auto; margin-
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Roman","serif";} span.EmailStyle16 {mso-style-type:personal-reply; font-fan
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t;font-family:"Calibri";"sans-
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Job.</p></o:p></span></p> <p class=3D"MsoNormal"><span style=3D"font-
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& Regard</span> </b><b><span style=3D"font-size:11.0pt;font-
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 Sent: Monday, August
 05, 2013 12:18 PM
 To: Kumar Nagdev
 Subject:
 Resume<o:p></o:p></p> <p
 class=3D"MsoNormal"><o:p> </o:p></p> <p>Sorry. Resume is attached
 now.<o:p></o:p></p> <p>VKARIUKI<o:p></o:p></p> </div> </body> </html>
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